

# Milbank

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**VIA ECF**

Honorable Dennis Montali  
United States Bankruptcy Court  
Northern District of California  
450 Golden Gate Avenue, 16th Floor  
San Francisco, CA 94102

Re: In re PG&E Corporation, Case No. 19-30088 (DM) (Jointly Administered)

Dear Judge Montali:

I write on behalf of the Official Committee of Unsecured Creditors (the “Committee”) of PG&E Corporation and its affiliated debtors (collectively, the “Debtors”), in connection with the Court’s July 29, 2019 *Order re Telephone Discovery Conference* [Docket No. 3235].

The Committee has the following open discovery request of the Official Committee of Tort Claimants (the “TCC”) and its individual members: information, including but not necessarily limited to, username and secure login password, that is sufficient to permit access to and download capability in the BrownGreer Portal,<sup>1</sup> including all data contained therein.<sup>2</sup>

Sincerely,

*/s/ Andrew M. Leblanc*

Andrew M. Leblanc

<sup>1</sup> “BrownGreer Portal” refers to a database established in the California North Bay Fire Cases Coordinated Proceeding, Case Number CJC-17-004955JCCP, in the Superior Court of the State of California, and referenced in *Case Management Order 5: Collection and Production of Case Management Order Compliance Information and Subrogation Files*, entered on December 28, 2018 in that proceeding.

<sup>2</sup> The Committee understands that both the Debtors and certain owners of common stock of PG&E Corporation (the “PG&E Shareholders”) have served subpoenas on BrownGreer PLC for all documents contained in, or accessible through, the BrownGreer Portal.

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